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Report Series 1991

91-11 AMO'S Policy Position on: REDUCTION AND REUSE

Association of Municipalities of Ontario
June 1991

MISSION STATEMENT

AMO unites Ontario's municipalities.

We take pride in promoting, supporting and enhancing strong and effective municipal government.

We provide strategic leadership by:

- developing and effectively promoting responsive quality policy;
- informing and educating governments, the media and the public;
- marketing innovative and beneficial services.

Our elected representatives, municipal officials and association staff form a team which values and respects:

- diversity and local autonomy;
- fairness and equity;
- consultation;
- consensus;
- co-operation.

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EXECUTIVE SUMMARY

Ontario municipalities have been working to both divert waste from their rapidly filling landfills and meet the Ontario government's waste diversion targets of 25 per cent by 1992 and 50 per cent by the year 2000. Through the waste management report series which it has published since early 1989, the Association of Municipalities of Ontario (AMO) has proposed ways to both meet the province's waste diversion targets and address concerns which municipalities have regarding municipal solid waste management.

Earlier this year, the Minister of Environment, the Honourable Ruth Grier, asked AMO to present her with a policy position paper on reduction and reuse. Soon after, she released Ontario's Waste Reduction Action Plan (WRAP), which has many initiatives related to municipalities.

AMO's Policy Position on Reduction and Reuse offers the Minister of Environment AMO's policies on reduction and reuse. It also responds to the initiatives announced in Ontario's Waste Reduction Action Plan (WRAP). Because the paper responds to Ontario's WRAP, it also incorporates AMO's policies on recycling and the blue box program. However, in including these, AMO has said the province's emphasis should be on reduction and reuse, which are the first "2Rs" of the "4Rs" waste minimization hierarchy of reduction, reuse, recycling and recovery of energy-from-waste. Recycling initiatives should only be emphasized after reduction and reuse because recycling is the third "R" in the hierarchy.

AMO's Policy Position on Reduction and Reuse has six sections. The first section, "Principles", notes some basic principles which municipalities have established for waste management. Because the legislation which governs them gives municipalities permissive authority to pass by-laws for the collection and disposal of garbage and ash, municipalities are key players in waste management. AMO has thus encouraged the province to include municipalities as partners in all solid waste management discussions which impact on them. Because there are many pressing concerns in waste management and the province is increasingly regulating the area, municipalities have also said waste management costs should be shared. The report illustrates these principles.

In the second section, "Government", AMO makes recommendations about waste management initiatives which the Ontario government could address related to the Canadian Council of Ministers on the Environment, the federal government, the provincial government, and municipalities. In the third section, "Private Sector", AMO recommends initiatives the Ontario government could address to encourage the private sector to adopt reduction and reuse. It also calls for support for the reuse sector. In section four, "Public", AMO notes members of the public are also key players in addressing waste management concerns.

AMO addresses the "Waste Reduction and Reuse Program" in section five. This includes recommendations to the Ontario government on waste audits, procurement policies, and statutory authority for municipalities - which includes introducing permissive authority to allow municipalities to collect user-pay fees for the collection of residential garbage. There are also recommendations to the province on tipping fees, true-cost accounting, recycling and its markets and symbols, packaging, composting, landfill bans, public education, refillable containers, direct mail, and household hazardous waste. Of particular interest is AMO's response to the mandatory source separation and mandatory composting programs which the province's WRAP has said Ontario's municipalities must soon introduce.

In section six, "Environmental Assessment", AMO notes the reports it has already done in this area.

Throughout AMO's Policy Position on Reduction and Reuse, AMO notes both its policies and the current work which it has been engaged in. It also points out the numerous initiatives with which it is already working with the Minister of Environment and the Ministry of Environment staff. Much work is currently being done regarding municipal solid waste management, and the Association of Municipalities of Ontario is pleased to be representing Ontario's broader municipal sector as an active partner in these important endeavours.

1 INTRODUCTION

On March 10, 1989, the Ontario government announced Ontario's goal was to divert municipal solid waste from landfill and incineration through reuse, recycling, reduction and recovery. The waste diversion targets were 25 per cent by 1992 and 50 per cent by the year 2000.

Municipalities and others have worked hard to meet those goals - both to conserve Ontario's resources and to preserve their rapidly filling landfill space. But progress has been slow and, in March 1991, the province's new Office of Waste Reduction estimated that if Ontario continued its current practices, only 13 per cent of its solid waste would be diverted by 1992 and 22 per cent by the year 2000.

On February 21, 1991, the Minister of Environment, the Honourable Ruth Grier, announced Ontario's Waste Reduction Action Plan (WRAP). She also asked the Association of Municipalities of Ontario (AMO) to provide her with a policy paper on reduction and reuse. This paper responds to the initiatives announced in Ontario's Waste Reduction Action Plan and also provides the Minister of Environment with AMO's policies on reduction and reuse.

In presenting this paper, AMO notes that while its emphasis was on the first "2Rs" of the "4Rs" waste minimization hierarchy of reduction, reuse, recycling and recovery of energy-from-waste, the Minister's WRAP focused extensively on recycling. Because AMO has chosen to respond to the WRAP's recycling initiatives in this paper, it emphasizes with the Minister that AMO believes reduction and reuse are waste management options which should be exercised before recycling. This is a position which the Minister herself has repeatedly said she favors, and AMO encourages her to proceed with that understanding and to institute waste reduction and reuse measures before recycling.

2 PRINCIPLES

2.1 Municipalities as Partners

The Ontario government has been focusing more attention on solid waste management. Under the legislation governing municipalities, municipalities have the permissive authority to pass by-laws to collect and dispose of solid waste. While municipalities recognize the province has become increasingly involved in this area, they wish to emphasize that they want to bring their waste management experience to the decision-making table and to be included in any decisions which impact on them in this field.

The Minister of Environment and her staff have begun to implement this principle. On October 12, 1990, the Minister of Environment, the Honourable Ruth Grier, consulted with AMO representatives before announcing that Ontario soft drink companies had six months to begin complying with the province's refillable quotas. AMO appreciated that consultation and was pleased with the Minister's announcement. The Minister of Environment now is holding bi-monthly meetings with AMO. Ministry of Environment staff members have been consulting with AMO regarding its large range of proposed waste management changes, and both the Minister and MOE have been actively including AMO representatives in the various waste management committees and groups working with the MOE.

AMO appreciates this consultation and is pleased that it can bring the broader municipal sector's perspective to these important discussions. It urges the provincial government to continue this very important consultation with municipalities as partners.

RECOMMENDATION #1:

The Ontario government should formally adopt the principle that municipalities will be included as partners in all solid waste management discussions which impact them.

2.1.1 Global Partnership

AMO has urged the Ontario government to establish a solid waste management working group which involves the provincial government, municipalities and the private sector. It should be composed of an equal number of members from each of the Ministry of Environment (MOE), private sector and AMO, which represents municipalities.

The working group would review:

- roles and responsibilities of the provincial government, municipalities and the private sector in sharing the responsibility for the proper management of the waste created from the goods produced by the private sector;
- fundamental principles of a waste management plan aimed at reducing the waste stream;
- nature of the joint provincial-municipal-private sector programs;
- funding mechanisms.

The MOE's Office of Waste Reduction is moving in this direction by establishing its "working groups" on master plans, wet waste, residential dry waste, and industrial/commercial/institutional waste. These multi-sector groups are to include municipal representatives and their recommendations are to form the basis of the waste reduction policy which the MOE plans to present to the Minister of Environment and Ontario Cabinet.

AMO appreciates the opportunity to participate in these working groups in order to bring the municipal perspective to the discussions. However, it urges the MOE to ensure that all of the components recommended above are addressed by these working groups for their designated areas.

RECOMMENDATION #2:

The Ontario Ministry of Environment should ensure that its waste reduction "working groups" address the following for their designated areas:

- **roles and responsibilities of the provincial government, municipalities and private sector in sharing the responsibility for the proper management of the waste created by the goods produced by the private sector;**
- **fundamental principles of a waste management plan aimed at reducing the waste stream;**
- **nature of the joint provincial-municipal-private sector programs;**
- **funding mechanisms.**

2.1.2 Recycling Programs

During the past six years, the Ministry of Environment (MOE) has worked with the private sector to introduce two phases of Ontario's blue box program. That arrangement, which has excluded municipalities in the program formation, has resulted in funding inequities for municipalities. The province, private sector and municipalities share the initial costs, but the long-term program funding is left to municipalities.

Now, the Ontario WRAP has announced that the Minister of Environment intends to make recycling mandatory for all but the smallest municipalities. The plan also said the Minister expects to expand the number of items going into the blue box program so these include corrugated cardboard, telephone books, magazines, boxboard and mixed rigid plastic containers.

These decisions impact on municipalities, and AMO, on behalf of municipalities, should be consulted before any of these programs are expanded or introduced.

In particular, if the province intends to pursue the

initiatives outlined in its WRAP, it should include municipalities in provincial-municipal-private sector discussions which address the partnership required by these programs. This is necessary to ensure inequities such as those which already exist are not continued in future programs.

The MOE has begun to do this in other areas by inviting AMO to participate, on behalf of municipalities, in the MOE's multi-sector waste reduction "working groups". AMO urges the province to provide a similar initiative to address the blue box recycling program and municipalities' partnership in that.

> RECOMMENDATION #3:
>
> The Ontario government should include municipalities in provincial-municipal-private sector discussions which address their partnership in the province's present and proposed recycling initiatives.

2.2 Financial Partnership

AMO, on behalf of Ontario's municipalities, has been:

- working with the province to disentangle their financial partnership. However, because:
  - there are many pressing concerns in waste management;
  - municipalities have permissive authority under The Municipal Act to pass by-laws for the collection and disposal of garbage and ash;
  - the province is increasingly regulating the entire waste management area;

  municipalities believe waste management costs should be shared.

AMO has also promised municipal impact statements by

the province. During AMO's May 1990 meeting with the Ontario cabinet, the province agreed to provide a cost projection for municipalities for any new program, policy, or revised program.

RECOMMENDATION #4:

In dealing with municipalities on waste management issues, the Ontario government should adopt the principles that:

- **waste management costs should be shared;**
- **the province should prepare municipal cost impact statements for programs or policies before these programs or policies are announced.**

2.2.1 Mandatory Waste Management Programs

The Ontario Waste Reduction Action Plan said:

- mandatory recycling will be required in all but the smallest municipalities, starting in early 1992;
- the province will make it mandatory for all recycling municipalities to have community composting facilities to accept and process leaves and yard wastes.

Neither of these program announcements was accompanied by municipal cost impact statements. The Minister of Environment has since said that statements are being prepared. AMO urges the Ontario government to release these cost impact statements as soon as possible and before any further steps are taken to make these programs mandatory.

RECOMMENDATION #5:

The Ontario government should release thee municipal cost impact statemetns for its mandatory composting and mandatory recyclingprograms as soon as possible. this information should be made available to AMO and municipalities before the province takes any further steps to make these programs mandatory.

2.3 Funding Programs

The Ontario WRAP said the MOE is:

- reviewing its financial and technical assistance to see how best to achieve, by 1992 its target of making it mandatory for all recycling municipalities to have community composting facilities to accept and process leaves and yard wastes;
- planning to increase to two-third its share of funding of municipal back yard composting programs. The MOE is currently paying one-half of eligible costs;
- reviewing provincial assistance programs, particularly enhancements to the blue box recycling program.

AMO urges the provincial government to address the points raised in the following recommendation.

RECOMMENDATION #6:

The Ontario government should:

- provide funding which reflects a "4Rs" waste minimization hierarchy of reduction, reuse, recycling and recovery, in that order;
- improve the MOE's funding programs by:

- eliminating the words "up to" in the grant programs;
- telling municipalities how much money is in a particular fund, and when that money has been depleted;
- instituting an announced time limit in which to reply to municipalities;
- increasing its funding for household hazardous waste days and depots.

AMO has also urged the provincial government to increase the amount of funding going into its total waste management package.

During its 1991 budget announcement, the Ontario government said it would provide an additional $28 million to municipalities to help them establish enhanced programs to meet the provincial waste diversion targets of at least 25 per cent by 1992 and 50 per cent by the year 2000. That amount was to more than double the previous year's provincial support for its municipal "3Rs" programs of reduce, reuse and recycle.

During its May 14, 1991 meeting with the Minister of Municipal Affairs, AMO thanked the government for the additional funding and asked for additional consultation on how the money is to be used.

RECOMMENDATION #7:

The Ontario government should consult with AMO, on behalf of municipalities, about how the extra $28 million announced in the 1991 budget for "3Rs" initiatives is to be used.

2.3.1 Blue Box Funding:

On October 15, 1990, Ontario's Minister of Environment, the Honourable Ruth Grier, said, "I will

no longer allow the manufacturers of waste to pass the buck to the public, their municipal governments and the recyclers". Ontario's WRAP announced on February 21, 1991 that the MOE is reviewing provincial assistance programs, particularly enhancements to the blue box recycling program.

Because municipalities now bear most of the costs of the current blue box system, AMO urges the province to address the points in the following recommendation.

RECOMMENDATION #8:

The Ontario government should:

- work with AMO, on behalf of municipalities, and the private sector, to develop a mechanism which will make the blue box program financially self-sustaining;
- institute cost-sharing in this mechanism, which should also include such costs as additional transportation costs for rural and northern areas;
- until that mechanism is developed, ensure that funding of the blue box program is equally shared one-third each by the province, private sector and municipalities.

2.3.2 Private Sector Funding

The Ontario WRAP said the MOE's "Industrial 3Rs" funding program will be improved to provide additional assistance and incentives for the industrial, commercial and institutional sectors to significantly expand their waste reduction activities.

AMO has urged the provincial government to address this area through the two following points.

RECOMMENDATION #9:

The Ontario government should:

- **ensure the Ministry of Environment uses its "Industrial 3Rs Program" to promote "4Rs" activities, according to the "4Rs" hierarchy, with respect to the material inputs and end products of industry;**
- **increase its funding assistance for municipal industrial-commercial-institutional (ICI) diversion programs to stimulate the necessary emphasis on this sector.**

2.4 "4Rs" Hierarchy

The Minister of Environment has repeatedly said since assuming office in October 1990 that while the province will explore the first "3Rs" of the waste minimization hierarchy of reduction, reuse, recycling and recovery of energy-from-waste, the first "2Rs" of reduce and reuse will take priority over the third "R" of recycling.

AMO has been pleased with the ordering of the Minister's hierarchy. It was also pleased by the Minister's announcement that the province is examining a program to introduce reuse as well as recycling at the Liquor Control Board of Ontario. AMO applauds this move, particularly if it promotes reuse over recycling.

However, AMO notes the province's WRAP focused extensively on recycling. There has also been increasing pressure from the soft drink industry on the province not to introduce a deposit/refund program for the wine and liquor bottles sold through the Liquor Control Board of Ontario.

AMO urges the Minister of Environment to firmly maintain her stance that reduction and reuse are priorities before recycling and to institute waste reduction and reuse measures before recycling. AMO also urges the provincial government to take the steps listed in the following recommendation.

RECOMMENDATION #10:

The Ontario government should:

- **adopt a "4Rs" waste minimization hierarchy of reduction, reuse, recycling and recovery of energy-from-waste, in that order;**
- **urge the federal government to adopt this hierarchy in its waste reduction targets;**
- **encourage - and urge the federal government to encourage - as part of this hierarchy, programs which promote the reduction of materials which would otherwise be considered as waste.**

2.4.1 Energy-from-waste

The Minister of Environment did not address energy-from-waste in Ontario's WRAP, but she announced on April 11, 1991 that the provincial government has banned all future municipal solid waste incinerators in Ontario.

AMO urges the provincial government to place its incineration statement in a policy, and also clarifies whether this policy includes refuse-derived fuel for municipal solid waste. AMO also urges the provincial government to bind the Environmental Assessment Board with the MOE's incineration policy so municipalities have one set of rules by which to operate rather than one from the Environmental Assessment Board and one from the Ministry of Environment.

RECOMMENDATION #11:

The Ontario government should:

- **place its incineration statement in policy;**
- **clarify whether this policy includes refuse-derived fuel for municipal solid waste;**
- **bind the Environmental Assessment Board with the MOE's incineration policy.**

3 GOVERNMENT

3.1 Canadian Council of Ministers on the Environment

The Ontario WRAP said the Minister of Environment would work through the Canadian Council of Ministers on the Environment (CCME) to press for national standards for recycled contents in packaging and goods, and for the promotion of national markets for reused and recycled goods and materials.

AMO applauds the Minister's initiative and urges her to vigorously pursue it.

RECOMMENDATION #12:

The Ontario Minister of Environment should urge the Canadian Council of Ministers on the Environment to:

- **amend the packaging policy goals to clearly express the "4Rs" waste minimization hierarchy of reduction, reuse, recycling and recovery of energy-from-waste, in that order;**
- **proceed, as was done with the National Packaging Protocol, to address, other components of the municipal solid waste stream. A starting point could be fine paper, magazines and advertising flyers.**

3.2 Federal Government

AMO has been very disappointed with the federal government's waste reduction initiatives. Although waste reduction was cited as an important area in the Green Plan, few details and little funding has so far been provided for the Green Plan.

AMO believes the provincial government should urge the federal government to take the actions listed in the following recommendation.

RECOMMENDATION #13:

The Ontario government should urge the federal government to:

- conduct more research and development projects for environmental issues and technologies which cross provincial and international boundaries. Information from these projects should be disseminated to municipalities;
- establish a national resource centre which would allow those interested in this area to access all available information on solid waste and its management from one central source. This centre should collect, compile and catalogue appropriate information in this area and disseminate information on its inventory to those wishing to access this;
- provide increased funding to those agencies which are carrying out programs of national significance related to solid waste;
- support the expansion of the Environmental Choice or EcoLogo program;
- change the Environmental Choice labels to clearly indicate whether a product or package should be reused, recycled, composted, treated

as a hazardous waste, or none of these;

- develop, in concert with representatives of other government levels and waste generators, a comprehensive national program to support the management of solid waste. Representatives of the municipal sector of government should be included in the multi-sector working group which develops this program;

- work in conjunction with the provincial governments to promote waste exchange.

3.3 Ontario Government

The Ontario WRAP said the Ontario government would create a provincial Waste Reduction Office to co-ordinate policy and recommend regulatory changes for waste reduction.

That Office of Waste Reduction has been created, and AMO is pleased that progress is being made in the field of waste management under this office.

AMO also urges the province to take the steps outlined in the following recommendation.

RECOMMENDATION #14:

The Ontario government should:

- adopt and publish an official policy, or pass legislation, which formally enshrines its provincial waste diversion goals;

- develop methods to record progress toward these goals, state what the year of comparison is to be, and state what can and cannot be counted for meeting those diversion targets;

- develop, in concert with municipalities, implementation guidelines to meet these targets;
- specify what percentage of the waste diversion goal it will take exclusive responsibility for. This should only include the areas of reduction and reuse, and it should not include any activities in which Ontario municipalities are, or will be, partners;
- take the lead role in developing the legislation and technology necessary to meet the Ministry of the Environment's waste diversion goals. Any necessary legislation or regulation should be developed by a working group which consists of the provincial government, municipalities and the private sector;
- assume a leadership role in accumulating information about the various waste reduction technologies available;
- assess the viability of these technologies so municipalities can adopt the province's recommended technologies. This would be more efficient than having each municipality individually review each new technology;
- conduct more research and development into this area;
- consider co-tendering with municipalities for projects which would assist public agencies in meeting waste reduction targets;
- continue to encourage reduction and reuse as an important component of waste management. This should be an on-going concern of the MOE and should extend beyond the two-year time frame in which the Minister of Environment has indicated she hopes to accomplish her Ontario Waste Reduction Action Plan.

The Ontario government should also develop a generic model to reduce waste which municipalities across Ontario can follow. Municipalities can then adopt this as the first stage of their Waste Management Master Plan. This would address the activities which should be followed to reach the 25% and 50% diversion targets. Municipalities could then concentrate on the remaining 50%, or disposal, part of their waste management plans.

AMO understands that the province is beginning to work on changes to the waste management master plan process, and one of those changes is to be a generic model which will reduce the number of steps municipalities must take to prepare the first phase of this plan. Part of this work is to be accomplished in consultation with AMO, through its Ad Hoc Waste Management Committee, and part is to be done through the MOE's master plan working group.

RECOMMENDATION #15:

In changing the waste management master plan process, the Ontario government should develop a generic model to reduce waste which municipalities across Ontario can then follow.

3.4 Municipalities

AMO has urged municipalities not currently engaged in waste reduction/reuse programs to undertake such programs. Some of the smaller municipalities have indicated a willingness to do that, but they have also emphasized they do not have the staff to develop the necessary programs.

AMO urges the provincial government to implement the measures outlined in the following recommendation.

RECOMMENDATION #16:

The Ontario government should:

- work with municipalities to adapt programs which are being done in other municipalities to suit the reduce and reuse program needs of other, particularly smaller, municipalities;
- release the third volume of its waste composition study, which provides municipalities with guidelines for conducting their own waste composition studies to define the nature of their waste streams and decide the best methods for diverting more waste from landfill.

4 PRIVATE SECTOR

4.1 Reduction and Reuse

The Ontario Waste Reduction Action Plan said:

- the province will make mandatory the source separation of waste by major retail malls, construction and demolition sites, office complexes, hospitality services such as larger restaurants, institutions such as schools, colleges and hospitals, and larger manufacturing industries.
- by early 1992, the Minister of Environment will introduce a regulation requiring major establishments to implement and maintain source separation programs for selected recyclable materials and to make all reasonable efforts to arrange for these materials to be reduced and reused. The regulations will eventually extend to all but the smallest operators in these sectors.

AMO supports the Minister of Environment's initiative, which is similar to AMO's policy. AMO asks the province to also take the steps outlined in the following recommendation.

RECOMMENDATION #17:

The Ontario government should:

- encourage the private sector to adopt the "4Rs" waste minimization hierarchy of reduction, reuse, recycling and recovery to manage its solid waste;
- if, by 1992, the MOE's waste reduction targets are not being met by the relevant industries, develop minimum standards and use them as a basis for "4Rs" regulations that would be enforced by the MOE;
- provide funding to help with the enforcement of the MOE's regulations;
- adopt AMO's policy that the private sector should redesign its products to increase their durability, longevity, and ability to be repaired in order to minimize the solid waste produced by consumer-used goods;
- encourage the private sector to reduce waste at source;
- encourage the private sector to reduce or eliminate the use of toxic materials in manufacturing goods;
- stimulate the industrial-commercial-institutional (ICI) sector's progress in this area by promoting the success of those municipalities with such programs and developing and promoting, on a province-wide basis, mandatory (ICI) waste reduction targets.

4.2 Support for Reuse Sector

Many small businesses, which repair appliances or provide second-hand outlets, have been struggling or closing. This leaves consumers with less reuse choice.

RECOMMENDATION #18:

The Ontario government should explore how it can support the reuse industries in the private sector.

5 PUBLIC

Members of the public should also be encouraged to become involved with waste management. They can actively participate by reducing the waste they generate, and dispose of, by reusing whatever materials they can - such as cloth bags rather than plastic grocery bags, ceramic rather than styrofoam coffee cups, and by donating used clothes to clothing depots. Members of the public should also start home composting programs, and they should be encouraged to recycle, both at home, where municipalities have started municipal recycling programs, and in their offices. People could also buy recycled materials where possible in order to promote markets for recyclable goods.

6 WASTE REDUCTION AND REUSE PROGRAM

6.1 Waste Audits

The Ontario Waste Reduction Action Plan said:

- the Ministry of Environment will conduct an environmental audit of its activities.
- the province will introduce a regulation in 1992 to require all major users of packaging materials to do waste audits and waste reduction plans. Any packaging not identified in their plans will not be permitted in Ontario.
- the province will require waste audits and waste reduction plans from other major industrial, commercial and institutional sectors. The MOE is to work with affected sectors to develop appropriate and consistent procedures for doing

waste audits and waste reduction plans.

AMO supports the province in pursuing this initiative. AMO has, through its series of waste management reports, also said:

- all government levels, plus the private sector, should conduct waste audits in order to reduce their own solid waste generation;

- municipalities should include in audits of their waste management systems information which would provide them with a true-cost accounting of their solid waste management systems.

As the province pursues its plan, AMO urges it to consider the points made in the following recommendation.

RECOMMENDATION #19:

The Ontario government should:

- recognize many "plant specific" opportunities for reducing waste may not be discovered because of a lack of information or training;

- provide municipalities with funding for this initiative if municipalities are to be the enforcing partner which ensures that the mandated waste audits are done by the industrial, commercial and institutional sector.

6.2 Procurement Policies

The Ontario WRAP said the Ministry of Government Services will study how the provincial government can contribute to waste reduction and support secondary materials markets through appropriate government purchasing policies.

AMO is encouraged by the province's interest in reducing its own waste and urges it to take the actions outlined in the following recommendation.

RECOMMENDATION #20:

The Ontario government should:

- **develop and implement material use and procurement policies which promote goods and services which reflect the first "3Rs" of the "4Rs" waste minimization hierarchy;**
- **apply these procurement policies to all government and private sector departments or ministries, agencies, boards and crown corporations. Where applicable, these policies should be enacted in legislation.**

6.3 Statutory Authority

The Ontario WRAP did not mention statutory authority for municipalities.

Increased statutory authority is a serious concern for municipalities. For some time AMO has been indicating to the province that municipalities need increased authority under the legislation which governs them in order to carry out all of the waste management initiatives now being required, or which are soon expected of them, by the provincial government.

AMO and staff representatives from the MOE and Ministry of Municipal Affairs have recently completed work on an implementation committee which was addressing ways AMO's statutory authority recommendations could be implemented.

AMO's recommendations in its previous waste management reports have urged the Ontario government to:

- review all municipal legislation for regional municipalities, counties and local municipalities where counties have not opted to take responsibility for waste management. The review and resulting legislative amendments would ensure that each municipality has sufficient waste management authority for reduction, reuse,

recycling and recovery of energy-from-waste projects.

- give municipalities authority to approve the establishment and continued use of private waste disposal systems and landfills in their jurisdiction in order to allow municipalities to be more effective in managing their area's solid waste stream. This is particularly important because presently, where a private landfill site co-exists with a public one, municipalities' waste reduction policies - such as bans - can be made ineffective if the private operator chooses not to participate.

AMO's Executive Committee has endorsed the implementation committee's outline for increased statutory authority for municipalities' waste management activities. The committee's recommendations now are being considered by senior staff of the Ministry of Environment and Ministry of Municipal Affairs, and AMO is presenting the reports to the Ministers of both of these ministries in June 18, 1991.

AMO urges the Minister of Environment and the Minister of Municipal Affairs to enact the committee's proposals in order to give municipalities the statutory authority they need to perform the waste management tasks being asked of them by the provincial government.

RECOMMENDATION #21:

The Minister of Environment and the Minister of Municipal Affairs should enact the committee's proposals in order to give municipalities the statutory authority they need to perform the waste management tasks being asked of them by the provincial government.

6.3.1 User-Pay Fees

AMO has recently endorsed the concept that the provincial government should give municipalities permissive legislative authority to collect user-pay fees for the collection of residential garbage.

Municipalities would then have the opportunity to:

- impose user-pay fees on residential garbage. Municipalities believe this would encourage residential users to use the power of the dollar to persuade the private sector to decrease the amount of waste material it passes to consumers;
- restrict the amount of garbage they will pick up weekly at each residence.

> RECOMMENDATION #22:
>
> The Ontario government should provide municipalities with permissive legislative authority to collect user-pay fees for the collection of residential garbage.

6.4 Tipping Fees

The Ontario WRAP said the Minister is concerned about municipalities and other landfill operators which set charges and tipping fees which do not reflect the real cost of opening, operating and eventually safely closing their sites. She wants to see more site operators raise the tipping fees for waste disposal sites to approximate the real cost of disposal. Part of the fees should meet the true costs and provide a reserve fund established by municipalities for "3Rs" and other waste management activities.

AMO has encouraged all Ontario municipalities to:

- set their tipping fees on municipally-owned landfill sites so these reflect the total life-cycle cost of operating their solid waste management systems;
- dedicate the revenue from tipping fees to fund their integrated waste management system;
- give commercial waste haulers and their clients advance notice of tipping fee increases.
- establish reserve funds.

RECOMMENDATION #23:

The Ontario government should:

- **realize that a significant portion of landfills, and thus the tipping fees generated by them, are controlled by private operators and are not under the direct regulatory control of municipalities;**
- **emphasize that reserve funds which plan for the future should also include replacement and perpetual care costs.**

6.5 True-Cost Accounting

The Ontario WRAP said the MOE is working with the Ontario Ministry of Treasury and Economics to find ways to implement a "true-cost" pricing system for municipal solid waste management systems. The Minister said she wants ideas from municipalities and AMO about this issue.

AMO has encouraged municipalities to do full-cost accounting and some municipalities have begun to explore and do that. AMO welcomes the opportunity to work with the province in this important area. However, it urges the province to take the steps noted in the following recommendation.

RECOMMENDATION #24:

The Ontario government should:

- **work with AMO to define the forum in which they will address true-cost accounting;**
- **explore this area much further before any decisions are made about its implementation.**

6.6 Recycling

The Ontario WRAP said that by early 1992, mandatory recycling will be required in all but the smallest municipalities. By early 1992, the MOE plans to have an implementation schedule for southern Ontario and a more gradual timetable for northern Ontario. In remote rural areas, where curbside collection is impractical, development of depots will be encouraged and supported.

Since that time, the province has defined the size of the "smallest" municipalities which will not be required to have mandatory recycling as being those with less than 5,000 people.

The MOE has also begun to consult with AMO, on behalf of municipalities, about the details of this mandatory program. AMO has appreciated the opportunity to provide municipal input to this provincial initiative before it is introduced, and it looks forward to working further in this regard with the MOE.

However, there are still several points which the provincial government should consider with regard to this initiative and how it impacts on municipalities.

The Ministry of Environment should more clearly define which system it plans for Ontario municipalities to follow. The Ontario WRAP discusses recycling and composting, which many municipalities are using. But there are also provincial initiatives to encourage wet/dry collection, and municipalities wish to know which system the province intends to pursue.

The Ministry of Environment should examine how to encourage maximum participation in the blue box program. AMO also urges the province to address the points noted in the following recommendation.

RECOMMENDATION #25:

The Ontario government should:

- **address the blue box and recycling funding questions, as noted earlier, before pursuing an expanded and/or mandatory program;**
- **continue to consult with municipalities before this mandatory program is introduced. It should particularly consult with municipalities before introducing any implementation schedules;**
- **more clearly define how the enhanced blue box system and mandatory source separation relates to the wet/dry collection system which the Ministry of Environment is encouraging some municipalities to adopt;**
- **examine how to encourage maximum participation in the blue box program.**

6.6.1 Recycling Markets

The Ontario WRAP says the Ministry of Environment (MOE) plans to:

- expand the blue box program to include corrugated cardboard, telephone books, magazines, boxboard and mixed rigid plastic containers;
- develop in consultation with other government levels, industry, labour, business and environmentalists an aggressive marketing strategy to encourage a strong and sustained demand for source separated used materials;
- examine the impact of government purchasing policies and economic incentives and disincentives, including taxation;
- explore co-operative efforts to encourage consumer preference and demand for recycled

content in products. It will assemble, based on its experience with OMMRI, a broader industrial environmental and governmental team to spearhead this effort.

- in conjunction with the Industrial "3Rs" funding program, speed up development of markets to keep pace with the amount of materials recovered.

AMO encourages the province to aggressively pursue this area of recycling markets as it is key in the continued use of the blue box system. Municipalities have said they need sufficient and well-paying markets to sustain this program. AMO urges the province to work with it and the private sector to develop a new system in which materials collected in the blue box can be recycled at a price which, collectively, pays for their collection and recycling. The province should not pursue expansion of the blue box program - either geographically or in the number of products collected - until the existing marketing problems have been solved.

RECOMMENDATION #26:

The Ontario government should:

- work with AMO and the private sector to develop a new system in which materials collected in the blue box can be recycled at a price which, collectively, pays for their collection and recycling;
- not pursue expansion of the blue box program - either geographically or in the number of products collected - until the existing marketing problems have been solved;
- continue to assist with the development of markets for recyclable materials;
- urge the federal government to help develop markets for recyclable materials and mechanisms to ensure those markets.

6.6.2 Recycling Symbol

The Ontario WRAP said the province plans to discuss with industry, consumers and its provincial and federal counterparts in the National Packaging Task Force the need to eliminate some confusion surrounding the recycling symbol - particularly in product labelling.

AMO applauds this move and urges the province to take the steps noted in the following recommendation.

> RECOMMENDATION #27:
>
> The Ontario government should work, preferably with other provinces and the federal government, to:
>
> - develop standardized definitions for "recyclable", "recycled content" and "compostable";
> - license these terms to reduce the confusion now caused by the misuse of them.

6.7 Packaging

The Ontario WRAP said a regulation will be introduced in 1992 to require all major packaging material users to do waste audits and waste reduction plans. Any packaging not identified in their plans will not be permitted in Ontario.

AMO, which has a member sitting on the National Packaging Protocol's infrastructure committee, applauds the Minister's initiative and strongly urges her to pursue this direction. AMO urges the province to take the steps outlined in the following recommendation.

RECOMMENDATION #28:

The Ontario government should urge the federal and other provincial governments to work with it to:

- **regulate firm dates by which the National Packaging Protocol's targets must be met by companies and enforce compliance;**
- **introduce regulations to ensure the National Packaging Protocol's targets for reducing packaging waste are met;**
- **work together to proceed, as was done with the National Packaging Protocol, to address other components of the municipal solid waste stream.**

Beyond these measures, which can be shared with other jurisdictions, AMO also urges the province in the following recommendation to take several steps to address the packaging concerns in its own jurisdiction.

RECOMMENDATION #29:

The Ontario government should:

- work with the packaging industry to coordinate research and development into packaging design and reduction and define packaging standards;
- set minimum standards for recycled content of packaging and minimum percentages for the proportion of a given package to be recycled;
- eliminate packaging which does not contribute to a product's protection;
- have packaging for a new or existing product pass a provincial review before it is approved for sale.

6.8 Composting

The Ontario WRAP said it will be mandatory for all recycling municipalities to have community composting facilities to accept and process leaves and yard wastes. The MOE is reviewing its financial and technical assistance to see how best to achieve this target in 1992.

The plan also said MOE's funding of municipal back yard composting programs will be increased to two-thirds from one-half of eligible costs. It added that the MOE and Waste Reduction Advisory Committee (WRAC) are studying back yard composting and preparing recommendations on a new provincial initiative for this.

Since that announcement, the Ontario government has released its provincial budget which promised to give another $28 million to "3Rs" activities. Early indications from MOE staff are that some of that money will be used to fund centralized composting facilities, but that has yet to be confirmed by the government.

AMO applauds the province's intention to increase funding for back yard composters. It is also looking forward to the time when the Minister of Environment will appoint nominees from AMO to the WRAC so the broader municipal sector has input into the development of WRAC's plan in this area.

However, before the province pursues this area of composting, AMO recommends the provincial government should address the points raised in the following recommendation. AMO recommends this be done as soon as possible so municipalities may proceed with work in this area.

RECOMMENDATION #30:

The Ontario government should:

- publish a formal statement on its policy for composting and its role in meeting the Ministry of the Environment's 25% and 50% waste diversion goals;

- evaluate composting technologies which already exist in North America and internationally for centralized composting facilities;
- provide approved specifications for centralized composting facilities;
- clarify its guidelines and approvals process for community composting;
- consult with municipalities on how mandatory composting facilities will be funded;
- provide MOE funding assistance for community composting facilities.

6.9 Landfill Bans

The Ontario WRAP said the MOE is considering the Waste Reduction Advisory Committee's (WRAC) recommendations for province-wide bans from landfill on such materials as corrugated cardboard, wood, drywall, brick, block, newsprint and yard waste.

Again, AMO is looking forward to the time when the Minister of Environment will appoint nominees from AMO to the WRAC so the broader municipal sector has input into the development of WRAC's plan in this area.

AMO is interested in the province's initiative since many municipalities are already considering, or instituting, landfill bans. AMO has urged:

- that municipalities, with the provincial government's assistance, to help commercial waste haulers and their customers, the waste producers, find "4Rs" alternatives for their materials;
- that, prior to banning certain commercial materials at municipal landfill sites, municipalities should give commercial waste haulers sufficient notice that the ban is going to be implemented;

- that all Ontario municipalities should ban the dumping of recyclable materials in their landfills where appropriate markets or facilities for these goods are available.

AMO emphasizes that this process should be followed and markets must be available before landfill bans for such items as cardboard, construction waste, wood and wood pellets, leaves and garden clippings are instituted. The provincial government should aid this by providing provincial funding to establish facilities to handle these products.

RECOMMENDATION #31:

When developing a policy on landfill bans, the provincial government should:

- incorporate the following process:
  - encourage municipalities, with the provincial government's assistance, to help commercial waste haulers and their customers, the waste producers, find "4Rs" alternatives for their materials;
  - encourage municipalities to give commercial waste haulers sufficient notice that a ban is going to be implemented prior to the time when the municipalities ban certain commercial materials at municipal landfill sites;
  - encourage all Ontario municipalities to ban the dumping of recyclable materials in their landfills where appropriate markets or facilities for these goods are available.
- ensure markets are available before landfill bans for such items as cardboard, construction waste, wood and wood pellets, leaves and garden clippings are instituted;

- aid market development by providing provincial funding to establish facilities to handle these products.

6.10 Public Education

The Ontario WRAP said the MOE is developing a comprehensive public education program to provide information, promotion, training and technical assistance on waste reduction to the public, schools, municipalities and industries.

AMO applauds the province for this initiative and urges it to make public education a primary plank in its waste reduction strategy since it can aid long-term attitudinal change, which is key to the province's success in meeting its waste diversion targets.

AMO also urges the province to take the steps outlined in the following recommendation.

RECOMMENDATION #32:

The Ontario government should:

- make public education a primary plank in its waste reduction strategy;
- establish a joint public education program involving the private sector, municipalities and the Ministry of the Environment;
- ensure the program provides a clear and co-ordinated message to all parts of the province;
- ensure the program also educates residents of different municipalities about their particular waste management system, general waste management issues, and new programs or initiatives requiring their involvement;

- keep municipalities informed of its waste management work, and progress, so municipalities can be full participants in the process;
- have the Office of Waste Reduction institute a regular municipal waste management newsletter which keeps municipalities informed of waste management developments in the MOE and in other municipalities;
- consider using the broadcast media and newspapers, because they are recyclable, rather than flyer advertising to reduce paper consumption and unsolicited direct mail.

6.11 Refillable Containers

In October 1990, the Minister of Environment announced she was giving Ontario's soft drink industry until April 1, 1991 to begin complying with the province's soft drink regulations. These require Ontario soft drink manufacturers to sell at least 30 per cent of their products in refillable containers. She also required the soft drink industry to launch an advertising campaign to promote reuse of refillable bottles.

The Ontario WRAP has said the province is requiring the Liquor Control Board of Ontario to prepare an action plan for reuse and recycling.

AMO applauds the province on both steps. Since the province's announcements, however, much has been happening regarding refillable containers.

The Ontario Soft Drink Association has indicated it cannot meet the refillable quotas which the Minister requested it to meet last October, and it is preparing a "3Rs" plan for soft drink containers. That plan is being reviewed by a multi-stakeholder workshop and AMO appreciates the opportunity to be included in this important event.

However, AMO emphasizes that it still believes reuse is better than recycling because reuse takes precedence

over recycling on the "4Rs" waste minimization hierarchy. Therefore, AMO continues to urge the Ontario Ministry of the Environment to take the steps noted in the following recommendation.

RECOMMENDATION #33:

The Ontario Ministry of the Environment should:

- **strengthen the regulations requiring soft drink containers to be refillable;**
- **extend these regulations to cover all beverage containers;**
- **ensure a deposit system is instituted for all beverage containers.**

OMMRI has also begun to oppose the provincial government's endeavour to consider establishing a deposit/return system for wine and liquor bottles sold through the Liquor Control Board of Ontario.

Because of this development and because of AMO's "4Rs" policy that reuse is better than recycling, AMO has responded to both the Minister of Environment and OMMRI by making the following recommendation.

RECOMMENDATION #34:

The Minister of Environment should not move away from refillable bottles unless the Ministry has done a net environmental analysis, including cost. If it can be shown in a global sense that the blue box is most cost effective, then there should be a move to make payment of this system consumer-priced rather than property-tax priced. This would enforce the principle that waste generators should be responsible for their waste.

6.12 Unsolicited Direct Mail

Ontario municipalities have been exploring the

possibility of introducing by-laws to prohibit delivery of "junk" or unsolicited direct mail. Those municipalities which have explored this option have found enforcing it would be very difficult.

AMO recommends the Ontario government implement the steps outlined in the following recommendation.

RECOMMENDATION #35:

The Ontario government should:

- encourage the minimization of unsolicited direct mail, otherwise known as "junk" mail;
- encourage the federal government to eliminate preferential treatment for unsolicited direct mail;
- require all materials used in unsolicited direct mail to be recyclable;
- and, if this unsolicited direct mail is made recyclable, find a mechanism to draw direct mail generators into OMMRI or a model similar to it so direct mail generators financially contribute to the waste management of this material.

6.13 Household Hazardous Waste

The Ministry of Environment currently will pay 50 per cent of the operating costs, up to a maximum of $5,000, for up to two special waste days or weekends which a municipality holds in one year. Applicants who recycle paint and oil are eligible for up to an additional $10,000.

RECOMMENDATION #36:

The Ontario government should increase its funding for household hazardous waste collection and remove the cap which it currently has on the program.

7 ENVIRONMENTAL ASSESSMENT

In the Ontario Waste Reduction Action Plan, the Minister said the Ministry of Environment plans to cut "red tape" to simplify the task of getting "3Rs" facilities into operation while retaining essential environmental controls and community involvement. The "simpler and quicker approach" would apply to "3Rs" facilities handling such items as wood waste, leaf and yard waste, "dry" recyclables, and "wet" food waste. Full environmental approval is still required for final waste disposal in landfill sites and household hazardous waste depots.

AMO has addressed the Environmental Assessment Act and planning and approvals process in its report, *The Waste Management Planning and Approvals Process* (March, 1989), and in its response to the report of the Environmental Assessment Program Improvement Project. It refers the province to these documents and notes that if more discussion is yet to take place on this area, AMO should be included in that process.

8 CONCLUSION

This paper is the Association of Municipalities of Ontario's response to the request which the Minister of Environment, the Honourable Ruth Grier, made earlier this year. At that time, she asked AMO to provide input into how Ontario's municipal solid waste can be reduced or reused. This paper also provides the Minister of Environment and her staff with municipalities' response to the Ontario Waste Reduction Action Plan, which the Minister announced on February 21, 1991.

Municipalities are the level of government responsible for municipal solid waste management. They wish to continue to manage this area and also work with the province as it becomes increasingly involved in this important field.

Municipalities believe provincial decisions made in the waste management area must be made in consultation with municipalities so there is a true provincial-municipal partnership. Funding concerns must also be addressed as these impact greatly on municipalities.

AMO applauds the provincial government for beginning the consultation process. The Minister of Environment consulted with AMO before announcing that Ontario soft drink companies had six months to begin complying with the province's refillable quotas. The Minister of Environment now is holding bi-monthly meetings with AMO. The MOE staff has been consulting with AMO regarding its large range of proposed waste management changes and both the Minister and MOE have been actively including AMO representatives in the various waste management committees and groups working with them. AMO appreciates this consultation and is pleased that it can bring the broader municipal sector's perspective to these important discussions.

As AMO presents this paper to the Minister of Environment on June 18, 1991, it looks forward to continuing its on-going dialogue with her and her staff. Working together, AMO believes the provincial and municipal levels of government can begin to solve the municipal solid waste concerns now facing Ontario.

9 SUMMARY OF RECOMMENDATIONS

Recommendation #1: The Ontario government should formally adopt the principle that municipalities will be included as partners in all solid waste management discussions which impact them.

Recommendation #2: The Ontario Ministry of Environment should ensure that its waste reduction "working groups" address the following for their designated areas:

- roles and responsibilities of the provincial government, municipalities and private sector in sharing the responsibility for the proper management of the waste created by the goods produced by the private sector;
- fundamental principles of a waste management plan aimed at reducing the waste stream;
- nature of the joint provincial-municipal-private sector programs;
- funding mechanisms.

Recommendation #3: The Ontario government should include municipalities in provincial-municipal-private sector discussions which address their partnership in the province's present and proposed recycling initiatives.

Recommendation #4: In dealing with municipalities on waste management issues, the Ontario government should adopt the principles that:

- waste management costs should be shared;
- the province should prepare municipal cost impact statements for programs or policies before these programs or policies are announced.

Recommendation #5: The Ontario government should release thee municipal cost impact statemetns for its mandatory composting and mandatory recyclingprograms as soon

as possible. this information should be made available to AMO and municipalities before the province takes any further steps to make these programs mandatory.

Recommendation #6:

The Ontario government should:

- provide funding which reflects a "4Rs" waste minimization hierarchy of reduction, reuse, recycling and recovery, in that order;
- improve the MOE's funding programs by:
- eliminating the words "up to" in the grant programs;
    - telling municipalities how much money is in a particular fund, and when that money has been depleted;
    - instituting an announced time limit in which to reply to municipalities;
    - increasing its funding for household hazardous waste days and depots.

Recommendation #7:

The Ontario government should consult with AMO, on behalf of municipalities, about how the extra $28 million announced in the 1991 budget for "3Rs" initiatives is to be used.

Recommendation #8:

The Ontario government should:

- work with AMO, on behalf of municipalities, and the private sector, to develop a mechanism which will make the blue box program financially self-sustaining;
- institute cost-sharing in this mechanism, which should also include such costs as additional transportation costs for rural and northern areas;
- until that mechanism is developed, ensure that funding of the blue box program is equally shared one-third each by the province, private sector and municipalities.

Recommendation #9:

The Ontario government should:

- ensure the Ministry of Environment uses its "Industrial 3Rs Program" to promote "4Rs" activities, according to the "4Rs" hierarchy, with respect to the material inputs and end products of industry;
- increase its funding assistance for municipal industrial-commercial-institutional (ICI) diversion programs to stimulate the necessary emphasis on this sector.

Recommendation #10:

The Ontario government should:

- adopt a "4Rs" waste minimization hierarchy of reduction, reuse, recycling and recovery of energy-from-waste, in that order;
- urge the federal government to adopt this hierarchy in its waste reduction targets;
- encourage - and urge the federal government to encourage - as part of this hierarchy, programs which promote the reduction of materials which would otherwise be considered as waste.

Recommendation #11:

The Ontario government should:

- place its incineration statement in policy;
- clarify whether this policy includes refuse-derived fuel for municipal solid waste;
- bind the Environmental Assessment Board with the MOE's incineration policy.

Recommendation #12:

The Ontario Minister of Environment should urge the Canadian Council of Ministers on the Environment to:

- amend the packaging policy goals to clearly express the "4Rs" waste minimization hierarchy of reduction, reuse, recycling and recovery of energy-from-waste, in that order;
- proceed, as was done with the National Packaging Protocol, to address, other

components of the municipal solid waste stream. A starting point could be fine paper, magazines and advertising flyers.

Recommendation #13:

The Ontario government should urge the federal government to:

- conduct more research and development projects for environmental issues and technologies which cross provincial and international boundaries. Information from these projects should be disseminated to municipalities;
- establish a national resource centre which would allow those interested in this area to access all available information on solid waste and its management from one central source. This centre should collect, compile and catalogue appropriate information in this area and disseminate information on its inventory to those wishing to access this;
- provide increased funding to those agencies which are carrying out programs of national significance related to solid waste;
- support the expansion of the Environmental Choice or EcoLogo program;
- change the Environmental Choice labels to clearly indicate whether a product or package should be reused, recycled, composted, treated as a hazardous waste, or none of these;
- develop, in concert with representatives of other government levels and waste generators, a comprehensive national program to support the management of solid waste. Representatives of the municipal sector of government should be included in the multi-sector working group which develops this program;
- work in conjunction with the provincial governments to promote waste exchange.

Recommendation #14: The Ontario government should:

- adopt and publish an official policy, or pass legislation, which formally enshrines its provincial waste diversion goals;
- develop methods to record progress toward these goals, state what the year of comparison is to be, and state what can and cannot be counted for meeting those diversion targets;
- develop, in concert with municipalities, implementation guidelines to meet these targets;
- specify what percentage of the waste diversion goal it will take exclusive responsibility for. This should only include the areas of reduction and reuse, and it should not include any activities in which Ontario municipalities are, or will be, partners;
- take the lead role in developing the legislation and technology necessary to meet the Ministry of the Environment's waste diversion goals. Any necessary legislation or regulation should be developed by a working group which consists of the provincial government, municipalities and the private sector;
- assume a leadership role in accumulating information about the various waste reduction technologies available;
- assess the viability of these technologies so municipalities can adopt the province's recommended technologies. This would be more efficient than having each municipality individually review each new technology;
- conduct more research and development into this area;
- consider co-tendering with municipalities for projects which would assist public agencies in meeting waste reduction targets;
- continue to encourage reduction and reuse as an important component of waste management.

This should be an on-going concern of the MOE and should extend beyond the two-year time frame in which the Minister of Environment has indicated she hopes to accomplish her Ontario Waste Reduction Action Plan.

Recommendation #15: In changing the waste management master plan process, the Ontario government should develop a generic model to reduce waste which municipalities across Ontario can then follow.

Recommendation #16: The Ontario government should:

- work with municipalities to adapt programs which are being done in other municipalities to suit the reduce and reuse program needs of other, particularly smaller, municipalities;
- release the third volume of its waste composition study, which provides municipalities with guidelines for conducting their own waste composition studies to define the nature of their waste streams and decide the best methods for diverting more waste from landfill.

Recommendation #17: The Ontario government should:

- encourage the private sector to adopt the "4Rs" waste minimization hierarchy of reduction, reuse, recycling and recovery to manage its solid waste;
- if, by 1992, the MOE's waste reduction targets are not being met by the relevant industries, develop minimum standards and use them as a basis for "4Rs" regulations that would be enforced by the MOE;
- provide funding to help with the enforcement of the MOE's regulations;
- adopt AMO's policy that the private sector should redesign its products to increase their durability, longevity, and ability to be repaired

in order to minimize the solid waste produced by consumer-used goods;

- encourage the private sector to reduce waste at source;
- encourage the private sector to reduce or eliminate the use of toxic materials in manufacturing goods;
- stimulate the industrial-commercial-institutional (ICI) sector's progress in this area by promoting the success of those municipalities with such programs and developing and promoting, on a province-wide basis, mandatory (ICI) waste reduction targets.

Recommendation #18: The Ontario government should explore how it can support the reuse industries in the private sector.

Recommendation #19: The Ontario government should:

- recognize many "plant specific" opportunities for reducing waste may not be discovered because of a lack of information or training;
- provide municipalities with funding for this initiative if municipalities are to be the enforcing partner which ensures that the mandated waste audits are done by the industrial, commercial and institutional sector.

Recommendation #20: The Ontario government should:

- develop and implement material use and procurement policies which promote goods and services which reflect the first "3Rs" of the "4Rs" waste minimization hierarchy;
- apply these procurement policies to all government and private sector departments or ministries, agencies, boards and crown corporations. Where applicable, these policies should be enacted in legislation.

Recommendation #21: The Minister of Environment and the Minister of Municipal Affairs should enact the committee's proposals in order to give municipalities the statutory authority they need to perform the waste management tasks being asked of them by the provincial government.

Recommendation #22: The Ontario government should provide municipalities with permissive legislative authority to collect user-pay fees for the collection of residential garbage.

Recommendation #23: The Ontario government should:

- realize that a significant portion of landfills, and thus the tipping fees generated by them, are controlled by private operators and are not under the direct regulatory control of municipalities;
- emphasize that reserve funds which plan for the future should also include replacement and perpetual care costs.

Recommendation #24: The Ontario government should:

- work with AMO to define the forum in which they will address true-cost accounting;
- explore this area much further before any decisions are made about its implementation.

Recommendation #25: The Ontario government should:

- address the blue box and recycling funding questions, as noted earlier, before pursuing an expanded and/or mandatory program;
- continue to consult with municipalities before this mandatory program is introduced. It should particularly consult with municipalities before introducing any implementation schedules;
- more clearly define how the enhanced blue box system and mandatory source separation relates

to the wet/dry collection system which the Ministry of Environment is encouraging some municipalities to adopt;

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- license these terms to reduce the confusion now caused by the misuse of them.

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- consult with municipalities on how mandatory composting facilities will be funded;
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Recommendation #31:

When developing a policy on landfill bans, the provincial government should:

- incorporate the following process:
  - encourage municipalities, with the provincial government's assistance, to help commercial waste haulers and their customers, the waste producers, find "4Rs" alternatives for their materials;
  - encourage municipalities to give commercial waste haulers sufficient notice that a ban is going to be implemented prior to the time when the municipalities ban certain commercial materials at municipal landfill sites;
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The Ontario government should:

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- keep municipalities informed of its waste management work, and progress, so municipalities can be full participants in the process;
- have the Office of Waste Reduction institute a regular municipal waste management newsletter which keeps municipalities informed of waste management developments in the MOE and in other municipalities;
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Appendix A - Acknowledgments

The Association of Municipalities of Ontario would like to thank the members of its Ad Hoc Waste Management Committee who volunteered their time to produce this document. It also wishes to thank the AMO staff who worked with the committee to develop this report. The members of the team were:

Ms Eileen Smith
Regional Councillor
Regional Municipality of Haldimand-Norfolk

Mr. Gary Cousins
Director of Planning
County of Wellington

Mr. Al Davidson
Waste Management Coordinator
County of Kent

Ms Joan King
Councillor
Municipality of Metropolitan Toronto

Mr. Don Markle
Commissioner of Public Works
Regional Municipality of Peel

Mr. Walter Scudds
Reeve
Village of Hastings

Ms Sylvia Sutherland
Mayor
City of Peterborough

Mr. David Smith
Waste Management Engineer
City of St. Catharines

Ms Judy Wilson
Director of Solid Waste
Environmental Services Department
Regional Municipality of Ottawa-Carleton

Ms Isabel Turner
Reeve
Township of Kingston

Mr. Jack Smylie
Alderman
City of North Bay

Mr. David L. Hall
City Administrator
City of Peterborough

Staff

Noelle Boughton
Policy Analyst

Christine Razmofsky
Secretary to Policy

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